

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Consolidated Case
	§	No: 5:21-cv-00844-XR
GREGORY W. ABBOTT, in his official capacity as Governor of Texas, et al.,	§	
	§	
<i>Defendants</i>	§	
	§	

DEFENDANT LISA WISE’S INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant Lisa Wise, in her official capacity as the El Paso County Elections Administrator (“Defendant Wise”), by and through her counsel of record, serves this statement of initial disclosures (“Initial Disclosures”). Defendant Wise reserves the right to supplement her Initial Disclosures, which are based upon information reasonably available to Defendant Wise as of this date. Continuing investigation and discovery may require amendment of these Initial Disclosures or supplementation, including to identify other potential witnesses, documents, and information. By making the following Initial Disclosures, Defendant Wise does not represent that she is identifying every document, tangible thing, or witness possibly relevant to this suit and Defendant Wise expressly reserves her rights pursuant to Rule 26(e). Nor does Defendant Wise waive her right to object to the production of any document or tangible thing disclosed herein on the basis of any privilege, work product doctrine, relevance, undue burden, or any other applicable objection under the Federal Rules of Civil Procedure. Defendant Wise’s Initial Disclosures are also made without in any way waiving (1) the right to object on the grounds of competency, privilege, relevance and materiality, hearsay, or any other grounds, to the use of such information for any purpose, in whole or in part, in any

subsequent proceeding or trial in this action or any other action; or (2) the right to object on any and all grounds, at any time, to any discovery request or proceeding involving or relating to the subject matter of these disclosures.

I. INDIVIDUALS

Pursuant to Rule 26(a)(1)(A)(i), the names, addresses, and telephone numbers, where applicable, of individuals likely to have relevant, discoverable information that Defendant Wise may use to support her claims or defenses, unless solely for impeachment, including the subject matter upon which each individual may have information, are as follows:

Individual/Title or Role	Contact Information	Subject Matter(s)
Lisa Wise, El Paso County Elections Administrator	To be contacted only through Defendant Wise's counsel	El Paso County's current policies and/or practices for voter registration; elections administration and security; the burdens imposed by SB 1 on voters and officials of El Paso County; responsibilities of administrators, poll workers, poll watchers, election judges and alternates, election clerks and alternates, and County Commissioners
Melissa Soto, El Paso County Election Administration Coordinator	To be contacted only through Defendant Wise's counsel	El Paso County's current policies and/or practices for voter registration and elections administration
Antonio Rivera, El Paso County Assistant Elections Administrator	To be contacted only through Defendant Wise's counsel	How El Paso County's voter data is organized, maintained, and queried
Vanessa Sepeda, El Paso County Elections Generalist Intermediate	To be contacted only through Defendant Wise's counsel	El Paso County's polling locations
Vanessa Ruiz, El Paso County Elections Generalist Senior	To be contacted only through Defendant Wise's counsel	How El Paso County recruits its poll workers
Melissa Rosales, El Paso	To be contacted only through	El Paso County's current

County Elections Information and Resources Coordinator	Defendant Wise's counsel	policies and/or practices for voter outreach
Flor Lopez, El Paso County Elections Generalist	To be contacted only through Defendant Wise's counsel	El Paso County's ballot-by-mail program
Any experts identified by El Paso County	To be contacted only through Defendant Wise's counsel	
Any individuals listed by Plaintiffs in their Rule 26(a)(1) disclosures	Contact through Plaintiffs' counsel	
Any experts identified by Plaintiffs	Contact through Plaintiffs' counsel	
Any individuals listed by the other Defendants or intervenors to this case in their Rule 26(a)(1) disclosures	Contact through each party's respective counsel	
Any experts identified by the other Defendants or intervenors to this case	Contact through each party's respective counsel	

II. DOCUMENTS

Subject to the qualifications set forth above, Defendant Wise discloses the following categories of documents, data compilations, and tangible things that are in Defendant Wise's possession, custody, or control that Defendant Wise may use to support her claims or defenses:

- Motions, pleadings, exhibits, and other public filings or documents exchanged in this litigation;
- Documents relating to El Paso County's current policies and/or practices for voter registration and outreach and elections administration;
- Documents relating to the advisories or directives from the Texas Secretary of State with respect to implementing and enforcing SB 1;

- Documents relating to the burdens on voters in El Paso County from enforcement of SB 1;
- Documents relating to the burdens on Defendant Wise and other officials of El Paso County resulting from enforcement of SB 1;
- Documents relating to whether the burdens imposed by SB 1 on voters and on El Paso County are necessary to conduct secure elections;
- Documents relating to whether the burdens imposed by SB 1 may suppress lawful voter turnout;
- Documents concerning evidence relating to benefits, or the lack thereof, accruing to the County and State from enforcement of SB 1; and
- Relevant documents identified during discovery, which is ongoing.

III. DAMAGES

Defendant Wise denies that Plaintiffs are entitled to any award of damages, fees, or costs against Defendant Wise or El Paso County. Defendant Wise reserves the right to assert counterclaims against Plaintiffs and/or crossclaims against Defendants, and may seek relief including damages, fees, and costs.

IV. INSURANCE

Pursuant to Rule 26(a)(1)(A)(iv), Defendant Wise states that she has no relevant insurance coverage.

Dated: November 5, 2021.

Respectfully submitted,

/s/ Orion Armon

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**Admitted pro hac vice*

*Attorneys for Lisa Wise, in her official capacity as
the El Paso County Elections Administrator*

CERTIFICATE OF SERVICE

I certify that on the 5th day of November, 2021, a true and correct copy of the foregoing document was sent via electronic mail to all counsel of record.

/s/ Orion Armon

Orion Armon